



Regulatory Changes in the CEW Recycling System to CRT Glass Options

**Jeff Hunts, Manager
Electronic Waste Recycling Program
Department of Resources Recycling &
Recovery (CalRecycle)**

Electronic Waste Recycling Act

As noted earlier, Act anticipated need for disposal:

- *PRC 42461. The Legislature finds and declares all of the following:*
 - *(a) The purpose of this chapter is to enact a comprehensive and innovative system for the reuse, **recycling**, and proper and legal **disposal** of covered electronic devices...*

Existing CEW System Rules

- Current regulations focus on recycling...
 - “*End-Use* Destination”
 - “Further Treat”
 - Limitations or prohibitions on disposal
- Structured to reflect and reinforce universal waste (and hazardous waste) requirements
- Attempted to use same terminology

Changing the CEW System Rules

- Will continue to reinforce UW and HW requirements.
 - Recycling should remain priority
- Will piggyback on UW and HW documentation requirements
 - Manifests? Notifications?
- Will attempt to use same terminology

Not Presenting Specific Proposals Today!

- Purpose is to:
 - Identify areas that may need to be edited or amended.
 - Solicit ideas and input on scope of changes.
- Extent and nature of changes will be affected by DTSC's rules.
- Focusing on CRT glass; Other changes later.

Definitions

- For the purposes of accommodating alternative recycling methods and/or disposal of CRT glass, no obvious changes identified.
 - *Possibly modify term “End-use Destination”*
- Able to reference words and terms defined elsewhere when establishing limitations or documentation requirements.

Applicability and Limitations

- 18660.6 (h) Limitations on recycling payments on exported CEWs and the disposition of treatment residuals:
 - ...*(2) If treatment residuals are disposed to land, water or air, then a recycler shall not be eligible for recycling payments for the original CEWs unless the treatment residual is not economically feasible to recycle and/or cannot be recycled because it would pose a hazard to public health, safety or the environment.*

General Requirements for Recycling Payment Claims

- 18660.22 (a)...(7)...The signature block shall include the following certification statements:
 - (A) “I hereby declare under penalty of perjury that:”
 - ...
 - 2. *“All claimed CEWs have been cancelled as specified in Section 18660.32 and are unable to re-enter the payment system, and **all treatment residuals specified in Section 18660.22(c) derived from the claimed CEWs have been shipped to an end-use destination authorized to receive and further treat those treatment residuals.**”*

General Requirements for Recycling Payment Claims

- 18660.22 (c) Prior to submitting a payment claim for cancelled CEWs, an approved recycler shall:
 - ***(1) Ship all the following treatment residuals derived from the cancelled CEWs* to an end-use destination authorized to receive and further treat the treatment residual....:***
- *Propose clarification (i.e. "...being claimed...")

General Requirements for Recycling Payment Claims

- 18660.22 (c)(1) ...
 - (A) *CRT glass cullet if conducting CRT or CRT-containing CEW cancellation through crushing or shredding.*
 - (B) *Bare CRTs if conducting CRT or CRT-containing CEW cancellation through dismantling to a bare CRT after relieving the vacuum.*
 - (C) *Gas plasma display glass cullet if conducting non-CRT-containing CEW cancellation through crushing or shredding.*
 - (D) *Bare gas plasma display panels if conducting non-CRT-containing CEW cancellation through dismantling to a bare panel.*

Additional Requirements for Recycling Payment Claims: 18660.23 &.24

- ...*(d) The reporting month for a recycling payment claim pursuant to this Section is the month in which shipment(s) of CRT glass cullet were made**.
- *Propose clarification on ***what*** glass was shipped (i.e. "...in fulfillment of 18660.22(c)...")
- First shipment? Last shipment?
 - Operative limitation is one claim per month.

Additional Requirements for Recycling Payment Claims: 18660.23 &.24

- *(g) An approved recycler shall attach...*
 - *(1) Shipping reports to end use destinations, including the names of the shipping recycler and the receiving end-use destination.*
 - *(2) The date of the shipment and the weight of the CRT glass cullet.*
 - *(3) Weight tickets of individual shipments of CRT glass cullet.*
 - *(4) Verification of post cancellation disposition, including:...*

Additional Requirements for Recycling Payment Claims: 18660.23 &.24

- *(g) ...(4) Verification of post cancellation disposition, including:*
 - *(A) For shipments by sea, the proof of disposition to an end-use destination shall be the on-board bill of lading and an executed contract or other documentation from the intended recipient of the shipment.*
 - *(B) For other shipments, the proof of disposition to an end-use destination shall include a receipt issued by the person receiving the shipment and any applicable bill of lading.*
 - *(C) For all shipments of CRT glass cullet, **a discussion of the ultimate disposition of the material shipped demonstrating that the disposition is not disposal to land, water or air.***

Other Ideas?

- Recordkeeping and document submittal?
- Inventory tracking?
- Additional limitations specific to CEW system?
- Concerns?